

Common Audit and Monitoring Findings

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WISCONSIN DEPARTMENT OF
PUBLIC INSTRUCTION

Tony Evers, PhD, State Superintendent

Audit and Monitoring Requirements

Uniform Grant Guidance

§200.501(a) *Audit required.* A non-Federal entity that expends \$750,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single or program-specific audit conducted for that year in accordance with the provisions of this part.

Uniform Grant Guidance §200.331 All pass-through entities must:

(6) (b) Evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring



Audit and Monitoring Requirements

DPI Monitoring

Occurs prior to awarding any federal funds to a subrecipient

Intent and Purpose

- Ensure that subrecipients use federal funds for the intended purpose
- Provide preventative assistance before mistakes are made and funds have to be returned

Federal Single Audit

Occurs at year-end after funds are spent

Determines whether the auditee has complied with Federal statutes, regulations, and the terms and conditions of Federal awards



DPI's Monitoring Process

The risk assessment is performed for:

- All federal grants, regardless of agency
- All subrecipients, regardless of type
- Every year



DPI's Monitoring Process

Types of subrecipients:

Public School Districts

Independent Charter Schools

CESAs and CCDEBs

Non-Profits

Government Agencies (DOC & DHS)

Public Libraries

Private Schools (Food Service)

Community Based Organizations



Risk Factors

Dollar amount of total federal funds

Known fraud

Significant or multiple audit findings

New subrecipient of federal award

No federal single audit required

Claims do not match financial annual report

Newly consolidated or created district

Program fiscal monitoring findings

Return of federal funds

Significant leadership turnover

Financial concerns

Compliance with prior year terms and conditions

Insufficient obligation of funds

Corporate management organization

Other concerns determined as a possible risk of noncompliance

Report cards



Common Risks

These are the most common risks identified that can result in terms and conditions placed on the federal grants:

- Known Fraud
- Significant or multiple audit findings
- New DPI recipient of federal funds
- Claims do not match annual reports filed with DPI
- Program fiscal monitoring findings
- Return of federal funds
- Not tracking expenditures



Terms & Conditions

Terms and Conditions/Monitoring Activities

- 1) Technical assistance
- 2) Review and testing of written procedures
- 3) Quarterly filing of claims
- 4) Supporting documentation submitted with claim
- 5) Cash reconciliation
- 6) DPI site visit



Terms & Conditions Follow Up

1) Technical assistance

- Contact subrecipient
- Provide technical assistance individually via phone
- Provide technical assistance online or conferences
- Provide links to available resources

Examples

- Unallowed cost identified on special education claim, DPI talked with the school district providing technical assistance. DPI comfortable that School District will be in compliance going forward
- After having the conversation with the school district above, DPI staff determined other districts were also reporting this unallowed cost, they would develop technical assistance for the DPI website



Required Written Procedures under the Uniform Grant Guidance

- The Federal Uniform Grant Guidance (2 CFR, Part 200) requires all subrecipients of Federal funds to document certain grant procedures.
- <https://dpi.wi.gov/wisegrants/uniform-grant-guidance/writtenprocedures>



Terms & Conditions Follow Up

2) Review and testing of written procedures

- Send DPI written procedures (cash management and allowable cost most common)
- Reviewed for existence and completeness
- If not, DPI provides subrecipient technical assistance and provides links to available resources
- Final written procedures are submitted to DPI

Example

- District uses the checklist available on DPI website and answers the questions. This is submitted to DPI as written procedures. DPI will contact school district and provide feedback and assistance on putting those responses into step by step procedures



Common DPI Monitoring Findings

Review and testing of written procedures

- No documentation
- Policy and no procedure
- Answers to DPI checklist of questions
- Lengthy and complicated
- Unaware of requirement



Terms & Conditions Follow Up

3 & 4) Quarterly claims & supporting documentation

- IDEA and Title I claims must be filed quarterly
- All claims for federal fund reimbursement must include a copy of the general ledger that matches the claim (printout by project code)
- Grant accountants review and follow up on any not matching
- Claim is not paid until supporting documentation matches

Example

When a grant accountant reviews the claim they will look for the costs on the claim to match the same WUFAR coding in the general ledger. If not, they will contact the LEA. This may result in journal entries to record costs appropriately in general ledger and developing a control that will ensure costs are properly accounted for.



Common DPI Monitoring Findings

- Supporting documentation submitted with grant claim
 - No use of project code
 - Year end journal entries moving costs
 - Dollar amount of claim does not match general ledger
 - Dollar amount by line item of claim does not match general ledger
 - Unallowable cost included



Terms & Conditions Follow Up

5) Cash reconciliation

- Sent to DPI
- Reviewed for completeness and balance
- If not, another month will be required to be sent until cash is reconciled

Cash Reconciliations

- After an audit finding has been identified and DPI places terms and conditions on the agency, generally a balanced cash reconciliation is provided



Terms & Conditions Follow Up

6) Site visit to review documentation and procedure

- Written procedures
 - Allowable cost
 - Cash management
- Federal grant budgets
- Federal grant claims
- General ledger
- Payroll reports
- Time and effort supporting documentation



2017-18 Terms and Conditions

For FY2017-18, there were 20 subrecipients identified

- 14 required to submit written procedures
- 9 required to quarterly submission and ledger support
- 2 required to submit cash reconciliations
- 1 required a site visit



Do's

- Document procedures
- Individuals involved are aware
- Review and test procedures to assure implementation
- Track project costs in general ledger (*project codes*)
- Include matching claims to general ledger (*General ledger should match WISEgrants*)
- Include review of costs to budget

Don'ts

- Ignore requirement for written procedures
- Never review procedures
- Do not share with individuals involved
- Wait until end of year to identify costs
- File claims that do not match costs per general ledger
- Not amending budget as needed



Audit of Written Procedures

Audit findings and management comments



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Schedule of Finding and Questioned Costs

Condition:

- Policies and procedures in place to safeguard assets and establish related controls over receipts, disbursements, payroll transactions and general ledger maintenance.
- Federal awards are managed through District-wide policies and procedures
- Policies and procedures have not been evaluated to ensure compliance with the requirements of Uniform Guidance



Schedule of Finding and Questioned Costs

- **Criteria:**

Uniform Guidance requires policies related to cash management, cost allowability, procurement, and conflict of interest provisions, along with appropriate financial management systems and internal controls over federal awards to safeguard federal funds

- **Cause:**

District has not finalized assessment of its financial management system and related internal controls over federal awards, along with evaluation of existing policies for compliance with Uniform Guidance



Schedule of Finding and Questioned Costs

Effect:

District could become noncompliant with requirements of Uniform Guidance, resulting in future findings and questioned costs related to federal awards.

Current audit did not identify noncompliance with direct and material compliance requirements of the major federal award program



Schedule of Finding and Questioned Costs

• Recommendation:

- Assessment of District's financial management system and related internal controls over federal awards.

Assessment should include:

- Evaluation of existing policies and procedures and determination of where additional enhancements should be made or new policies created
- A plan to communicate policies to District employees
- Procedures to periodically review and update



Management Letter

- **Comment #1 Uniform Grant Guidance Documentation (UGG)**

District was not required to have a Federal Single Audit

District has not fully implemented the requirements of UGG

Per discussions with key staff and review of available policies and procedures.

UGG requires organizations that receive Federal awards to enhance their control documentation over managing these grants in an effort to strengthen oversight of federal awards.

Recommend enhancing UGG documentation

District currently working with an agency to create policies and procedures.



Other Comments and Observations

Federal awards received by District were less than \$750,000.

Wisconsin Public School District Audit Manual requires review of internal controls over federal and state awards, a Uniform Grant Guidance audit may have resulted in additional testing of internal controls or compliance over federal awards which may have identified areas where your internal control documentation or District policies could be enhanced or improved primarily with Allowable Costs, Cash Management, Procurement Suspension and Debarment, Conflict of Interest and Reporting



Other Comments and Observations

- **Appropriations**

Budget categories had expenditures in excess of amounts budgeted (appropriated). District should continue to monitor its expenditure activity and adopt budget amendments when necessary to properly authorize expenditures

CFR 2, §200.308(a) The approved budget for the Federal award summarizes the financial aspects of the project or program as approved during the Federal award process.

CFR 2, §200.308(b) Recipients are required to report deviations from budget or project scope or objective, and request prior approvals from Federal awarding agencies for budget and program plan revisions, in accordance with this section.

CFR 2, §200.302(b) The financial management system of each non-Federal entity must provide for comparison of expenditures with budget amounts for each Federal award.



Other Comments and Observations

District does not have a formal policy regarding employee conflicts of interest

CFR 2, §200.318(c)(1) The non-Federal entity must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts.



Other Comments and Observations

- Although District management has a good understanding of the rules and regulations regarding procurement, Uniform Grant Guidance requires that the procurement policy be written
- The District's purchasing policy should be updated for the new Uniform Grant Guidance procurement requirements for the 2016-17 school year

CFR 2, §200.318(a) The non-Federal entity must use its own documented procurement procedures which reflect applicable State, local, and tribal laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in this part.



Other Comments and Observations

The district filed the majority of its grant claims after year-end. This is not proper cash flow management. It also deters the District from reviewing the expenses related to the grant on a periodic basis. We recommend the District file their grant claims throughout the year in order to efficiently manage their cash flow and related expenses.



Required Authorizer Annual Report

All authorizers are required to annually (December 1st) submit to the state superintendent and to the legislature a report that includes:

- 1. An identification of each charter school operating under contract with it, each charter school that operated under contract with it but had its contract non-renewed or revoked or that closed and each charter school under contract with it that has not yet begun to operate.**



Required Authorizer Annual Report

- 2. The academic and financial performance of each charter school operated under contract.**

- 3. The operating cost the authorizing entity incurred as a result of fulfilling its duties under Wis. Stat. 118.40(3m), detailed in an audited financial statement prepared in accordance with Generally Accepted Accounting Principles (GAAP).**



Required Authorizer Annual Report

4. The services the authorizing entity provided to charter schools under contract with it and an itemized accounting of the cost of the services.

The DPI has developed a [Technical Assistance Document](#) and an [Annual Report Template](#) to assist authorizers in meeting this requirement. To access these pages go here:

<https://dpi.wi.gov/sms/charter-schools/information-authorizers>

The report, corresponding to the current 2017-18 school year is due December 1, 2018.



Resources

- Uniform Grant Guidance-DPI Webpage
<https://dpi.wi.gov/wisegrants/uniform-grant-guidance>
- Written Procedures-DPI webpage
<https://dpi.wi.gov/wisegrants/uniform-grant-guidance/writtenprocedures>



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Open Q & A

Questions
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